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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA)	No. CR 11-000947 WHA
)	
14)	
15 v.)	STIPULATION AND PROPOSED
)	ORDER REQUESTING A CHANGE OF
16 MEGHAN CENTERWALL BASSO,)	PLEA DATE AND ORDERING
)	PRESENTENCE INVESTIGATION
17 Defendant.)	REPORT
)	
18)	

19
20 The United States of America respectfully submits this joint stipulation and proposed
21 order requesting: (1) the setting of a simultaneous change of plea and sentencing date; (2) an
22 order directing the preparation of a Presentence Investigation Report; and (3) the exclusion of
23 time under the Speedy Trial Act until the change of plea/sentencing hearing. The parties hereby
24 stipulate and agree to the following:

25 1. The defendant is charged in the above-captioned Information with one count of
26 conspiracy to commit bank and wire fraud, in violation of 18 U.S.C. § 1349. The parties have
27 reached a disposition in principle in this matter.

28 2. The defendant, however, gave birth to her first child approximately six weeks ago,

1 and most of her time is now spent caring for the child. Accordingly, the defendant, with the
2 consent of the Government, would respectfully request that the presently-scheduled change of
3 plea date of December 11, 2012 be continued until late February or early March 2013, so that the
4 defendant can plead guilty and be sentenced in the same proceeding, thereby minimizing her time
5 away from her child. The parties would also request that, in the meantime, the Court order the
6 preparation of a Presentence Investigation Report so that sentencing can proceed as contemplated
7 above.

8 3. Should the Court grant the requested continuance, the parties would further ask
9 that time be excluded under the Speedy Trial Act until the new change of plea/sentencing date.
10 Exclusion would serve the interests of justice because the requested continuance is being made
11 accommodate the defendant's changed personal circumstances.

12 SO STIPULATED.

13 MELINDA HAAG
14 United States Attorney

15 DATED: December 6, 2012

16 By: /s/
17 W.S. WILSON LEUNG
Assistant United States Attorneys


18 DATED: December 6, 2012

19 /s/
20 MARTHA BOERSCH, ESQ.
Attorney for MEGHAN CENTERWALL BASSO

21 FOR THE FOREGOING REASONS, IT IS HEREBY ORDERED THAT the December
22 11, 2012 appearance in the above-captioned matter is vacated, and that the change of plea and
23 sentencing shall proceed on March 5, 2013;

24 IT IS FURTHER ORDERED THAT a Presentence Investigation Report shall be prepared
25 for the defendant in anticipation of sentencing.

26
27 DATED: December 10, 2012

28 
HON. WILLIAM H. ALSUP
United States District Judge